

Exhibit A



GOLDBERG SEGALLA^{LLP}

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June 3, 2013

BY FEDERAL EXPRESS

Nicholas A. Vytell, Esq.
Carroll, McNulty & Kull, LLC
570 Lexington Avenue, 8th Floor
New York, New York 10022

Re: Oleg Cassini Inc. v. Electrolux Home Products
Our File No. 4520.0007

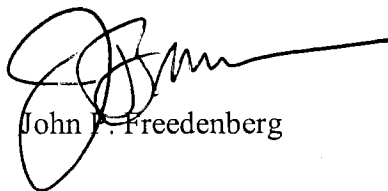
Dear Mr. Vytell:

Enclosed please find a portable hard drive containing defendant's document production bates numbered EHP CASSINI 0000238 to 0163142, along with an index of the documents, all served in response to plaintiff's demands, and as further discussed in our letter of May 1, 2013. Please note that this disclosure is made pursuant to the terms of the protective order entered in this action.

Defendant requests that plaintiff withdraw the pending motion to compel. As you can see, we have made a comprehensive disclosure, and the effort undertaken to compile and produce was very time-consuming.

Thank you for your consideration.

Very truly yours,



John P. Freedenberg

JPF:j

Cc: (without enclosures)
J. Vincent Reppert, Esq.
Ellen H. Greiper, Esq.

Cassini Production Index

Bates-Range	Description
EHP CASSINI 0000238-0016274; 0016385-0020735	Readily available claim files for electric dryers
EHP CASSINI 0016275-0016355	Emails from AHAM to Electrolux
EHP CASSINI 0020736-0022622	Depositions from State Farm (Haroutounyan) v. Electrolux
EHP CASSINI 0022623-0022654	Service Provider Policy
EHP CASSINI 0022655	Annual Demand for Flexible Foil Venting
EHP CASSINI 0022656-0022671	Service Provider Application
EHP CASSINI 0022672-0044030; 0045330-0136553	Emails to and from engineers, including Carl King, Brian Ripley, Mike Ricklefs, John Jergens, and Shelley Clausen responsive to the terms "fire, burn, smoke, and melt" and all derivatives
EHP CASSINI 0044031-0044418	Communications with the CPSC
EHP CASSINI 0044419-0044485	Engineering Design Drawings, Engineering Change Notices, and Document Change Requests for heater pan, felt seal, drum, drum glide, air duct, air duct seal, and blower housing
EHP CASSINI 0044486-0044585	Emails from quality to engineering regarding the felt seal
EHP CASSINI 0044586-0044621	Comparative Lint Testing Documents
EHP CASSINI 0044622-0045329	Technical Training Manuals, Service Manuals and Service Bulletins
EHP CASSINI 0136554-0151768	Testing Documents for Dryers
EHP CASSINI 0151769-0158580	Engineering Design Binders for the Alliance, Next Level, and Affinity Platforms
EHP CASSINI 0158581-0163142	Production, Depositions, and Expert Reports from Schantz; Corporate Retention Policies, and Warranty Data for electric dryers responsive to the terms "fire, burn, melt, and smoke" and all derivatives